

**From:** [HarborComments](#)  
**To:** [PortlandHarbor](#)  
**Subject:** Attn: Portland Harbor Superfund Comments, Reject Proposed Changes  
**Date:** Monday, December 24, 2018 1:00:08 AM

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**From:** (b) (6)  
**Sent:** Friday, December 21, 2018 12:56 PM  
**To:** HarborComments <HarborComments@epa.gov>  
**Subject:** Attn: Portland Harbor Superfund Comments, Reject Proposed Changes

Dear Environmental Protection Agency,

I urge you to reject proposed changes to the 2017 Portland Harbor Superfund Cleanup Plan. With more than 16 years of public process, the public has waited too long already for the cleanup to begin. It is time to move forward with implementing the 2017 plan as written. I am particularly concerned that the EPA is proposing to eliminate the planned dredging and removal of about 17 acres of river bottom that is highly contaminated with cPAHs at NW Natural "GasCo Site" and the Port of Portland's "Terminal 4".

The "Explanation of Significant Differences" (ESD) proposed by the EPA in October 2018 would lower the standard for threat risk associated with carcinogenic polycyclic aromatic hydrocarbons (cPAHs). The actual risk does not change, so people, fish and wildlife will be at continued risk of unnecessary exposure to these toxic chemicals in Portland Harbor indefinitely. NW Natural and the Port of Portland have been two of the most aggressive advocates for a weaker cleanup plan, with clear self interest, as the proposed changes will save them \$35 million in cleanup costs.

Reasons that EPA should reject the changes proposed in the ESD:

- Leaving these contaminants in the river at the "GasCo site" and "Terminal 4" means that people and wildlife will continue to be at risk of exposure for an indefinite period of time.
- There is inadequate information about how these contaminants may migrate in our river over time and how they may interact with other toxic contaminants in the river.
- The procedure that EPA used to make these changes was done outside the normal process for amending a Cleanup Record of Decision and sets a bad precedent for other polluters to request changes to the cleanup plan in the future.
- The changes have not been subject to public process but were developed through behind the scenes lobbying by parties with a long track record of advocating for a weak cleanup plan that reduces their costs at the expense of public and environmental health.
- In 2017, the EPA chose a cleanup alternative that was already far weaker than what the vast majority of the public who commented on the cleanup options supported. The changes being proposed now further weaken that plan.

It's time for the EPA to move forward with the cleanup plan that was adopted, not work behind the scenes with polluters to weaken the plan. Implementation of the plan is already behind schedule. I acknowledge that EPA has recently sent a strong message to responsible parties that they need to move forward expeditiously to develop cleanup agreements and start the cleanup process. However, the proposed changes undermine public confidence that EPA is committed to moving forward. After nearly two decades, EPA needs to focus all its resources on moving the 2017 plan to

implementation and our river towards health. Please reject the changes in the ESD.

Thank you

Sincerely,

(b) (6)

Portland, OR 97215